

May 16, 2011

Client-Matter: 42531-030

VIA U.S. MAIL AND E-MAIL

Crystal Spurr, Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

**Re: Broad Beach Restoration Project - Comments on the Notice of Preparation
of Draft Environmental Impact Report**

Dear Ms. Spurr:

This firm represents Trancas-PCH, LLC, the owner of the property at 6155 Trancas Canyon Road and 30999 Pacific Coast Highway. We are very concerned about the proposed Broad Beach Restoration Project (the "Project") and will be carefully reviewing the Draft Environmental Impact Report (the "DEIR") when it is released for public comment. At the outset, we would like to comment on only two components of the Project's Notice of Preparation ("NOP").

Much of the proposed Project is aimed at protecting existing private property septic systems and leach fields along Broad Beach. For example, the NOP for the Project states that "[t]he severe erosion problem threatened private property septic systems and leach fields along this stretch of the beach. A discussion of the potential issues with existing septic systems and leach fields with relation to the potential for releases affecting water quality and beach closures will be discussed in the EIR." (NOP, p. 11).

The existing septic systems along Broach Beach do great damage to water quality in the Santa Monica Bay, yet much of the proposed Project is geared at protecting and perpetuating them. No meaningful discussion of potential issues with existing septic systems and leachfields can be had if their elimination is not carefully considered. Accordingly, the DEIR must analyze an alternative that includes removal of these septsics, such as a water treatment facility tie-in requirement. Because all the currently proposed alternatives keep the septic systems in place, the proposed three alternatives do not provide a reasonable range of alternatives pursuant to the California Environmental Quality Act. An alternative that includes septic system removal would be environmentally superior to the Project as proposed.

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Finally, Trancas-PCH, LLC will be submitting an application to develop its property shortly. As such, the DEIR should include this project in its related projects list. The Trancas-PCH, LLC project will propose 46 homes and associated residential amenities, a significant open space component, and a community water treatment facility.

Please do not hesitate to contact me or my colleague, Victor De la Cruz, if you have any questions. Victor can be reached at (310) 312-4305.

Thank you very much for your consideration of the above comments.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Lisa Specht', with a long, sweeping horizontal line extending to the right.

Lisa Specht
Manatt, Phelps & Phillips

cc: Mr. David Wilstein, Trancas-PCH, LLC
Mr. John Spranza, Trancas-PCH, LLC
Mr. Victor De la Cruz, Manatt, Phelps & Phillips, LLP